

**Commonwealth of Kentucky  
Division for Air Quality**

**PERMIT APPLICATION SUMMARY FORM**

Completed by:  
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General Information

Name:	American Greetings Corporation
Address:	American Greetings Road Corbin, KY 40702
Date application received:	December 11, 1997
SIC/Source description:	2771; printing and publishing
AFS (9-digit) Plant ID:	21-125-00035
EIS #:	101-2120-0035
Application log number:	F454
Permit number:	V-98-049

Application Type/Permit Activity

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
<input type="checkbox"/> Administrative	<input checked="" type="checkbox"/> Title V
<input type="checkbox"/> Minor	<input type="checkbox"/> Synthetic minor
<input type="checkbox"/> Significant	<input checked="" type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

Compliance Summary

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

Applicable Requirements list

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> Other

Miscellaneous

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Class I area impacts
- ☐ Area is non-attainment for:

## Emissions Summary

Pollutant	Actual (tpy)	Potential (tpy)
PM10	7.251	1934.918
SO <sub>2</sub>	0.216	0.216
NOx	34.486	34.486
CO	7.234	7.234
VOC	4423.597	4423.597
LEAD	0	0
HAP $\geq$ 10 tpy (by CAS)		
Glycol Ethers (0)	59.38	59.38

### **Source Process Description:**

This source manufactures assorted paper products. Processes include the receiving of the raw materials all the way through to the finished product. The company uses rotogravure, flexographic and lithographic printing to make various paper products including but not limited to paper cups, gift wrapping, greeting cards and so on and so forth. Inks, solvents and cleanup solutions will be used in the various printing applications. Additionally, natural gas will be used to operate the space heaters and the ovens for drying the inks.

### **Emission and Operating Caps Description:**

This source is major for VOC's and for HAP's. The company has existing permit limits on several different permits which have been kept and translated to this Title V permit.

PM emissions will total 1,934.9 tons per year potential. Control devices on the affected facilities generating the PM emissions will make the actual emissions 7.3 tons per year. The new (401 KAR 59:010) and existing (401 KAR 61:020) particulate matter emissions regulations will apply to some of the PM emissions and allowables have been calculated and will be on the permit as emission limits at the applicable emission points.

VOC emissions will total 4,423.6 tons per year potential. The company is located in an attainment area for ozone. There will not be any control equipment on the VOC-emitting affected facilities. State regulation 401 KAR 59:212, New graphic arts facilities using rotogravure and flexography, will not apply to the rotogravure printing operations as these affected facilities commenced operation before the classification date of February 4, 1981, listed in the regulation. Additionally, pertaining to the flexographic printing operations they are exempt from the VOC emission limitation standards discussed in Section 3 of 401 KAR 59:212 because the company claims an exemption under Section 6 of the regulation (Use of water-borne ink whose volatile portion consists of seventy-five (75) volume percent water and twenty-five (25) volume percent organic solvent (or a lower VOC content) in all printing units). Lithographic printing operations are not subject to any regulations.

HAP emissions will total 59.4 tons per year of glycol ethers, thus state regulation 401 KAR 63:060, Hazardous air pollutants and source categories, will apply. The MACT, Final Standards for Hazardous Air Pollutant Emissions from the Printing and Publishing Industry (40 CFR Part 63, Subpart KK), will not apply as the standard applies to publication rotogravure operations, product and packaging rotogravure operations and wide-web flexographic printing operations. This facility of American Greetings does not perform any of these processes nor does the company have any wide-web flexographic printing operations. However, it should also be noted that the company has petitioned EPA to change a state SIP requirement from a 24-hour averaging period to a 30-day averaging period for VOC emissions. EPA has accepted this change and therefore the permit will reflect the company's request for a longer averaging period.

The state regulation 401 KAR 51:017, Prevention of significant deterioration of air quality, will not apply as the company has not triggered any of the requirements which would make it applicable to this regulation. The company has on miscellaneous permits accepted synthetic minor permit limits which keeps them from triggering the significant net emissions increase threshold amount of 40 tons per year VOC. These limits will be carried over to their Title V permit.

There are several natural gas-fired units at this facility. The direct fired units are not subject to regulation. However, the natural gas-fired boilers are subject to state regulation 401 KAR 59:015, Indirect heat exchangers. PM and SO<sub>2</sub> allowables have been calculated and will be listed on the permit as emission limits for these pollutants from the boilers.